EXHIBIT 2

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Page 1
 1
                  UNITED STATES DISTRICT COURT
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               NORTHERN DISTRICT OF CALIFORNIA
 3
                     SAN FRANCISCO DIVISION
 4
 5
     WAYMO LLC,
                                    )
            Plaintiff,
 6
 7
     VS.
                                   ) Case No.
 8
     UBER TECHNOLOGIES, INC.; ) 3:17-CV-00939-WHA
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     OTTOMOTTO LLC; OTTO TRUCKING )
10
     LLC,
11
            Defendants.
         HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
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13
14
     OTTO TRUCKING LLC'S VIDEOTAPED 30(b)(6) DEPOSITION OF
15
                       PIERRE-YVES DROZ
16
                     Palo Alto, California
17
                    Tuesday, August 22, 2017
18
                            Volume I
19
20
     Reported by:
     CATHERINE A. RYAN
21
22
     CMR, CRR, CSR No. 8239
2.3
     Job No. 2685937
24
25
     PAGES 1 - 92
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1	Q At these at these open garages was 14:43:52	1	I reconsidered at the time, and then having those 14:46:32
2	there someone available to answer questions about	2	devices home was more information that I considered
3	how the LiDAR devices worked?	3	as probably not being a good idea.
			. , , , , , , , , , , , , , , , , , , ,
4	A There was.	4	Q Other than Mr. Levandowski, was anyone
5	Q And who were those people? 14:43:59	5	else aware of the fact that you had a TBR device at 14:46:47
6	A So in I'm sorry. In Mountain View	6	home?
7	there was me.	7	A I'm not sure. Maybe. I'm not sure,
8	Q And what about in Austin and Phoenix?	8	actually.
9	A And I think Gill was one of them for	9	Q Would Mr. Urmson have known?
10	one of the achievements, I think, was the Phoenix 14:44:11		A I don't think he knew. 14:46:59
11	event, but I'm not sure, and I'm not sure who was	11	Q Or Mr. Salesky?
12	there for the Austin event.	12	A I don't think he knew.
13	Q Anyone else?	13	Q Other than Mr. Pennecot and you, are you
14	A Not that I know of.	14	aware of anyone else keeping any momentos, printed
15	Q Did GBr2 have ? 14:44:2.		circuit boards associated with Google's LiDAR 14:47:11
16	MR. JAFFE: Objection. Beyond the scope.	16	devices?
17	THE WITNESS: GBr2 has	17	MR. JAFFE: Object to form.
18	not anything you can see from looking at the	18	THE WITNESS: I remember I got Laila maybe
19	outside, though. That's for sure.	19	at some point, like I know she had one at her
20	BY MR. CHATTERJEE: 14:44:39	20	desk. I don't know if it ever left Google, though. 14:47:27
21	Q Are you aware of any public disclosures of	21	BY MR. CHATTERJEE:
22	the printed circuit boards for any of the LiDAR	22	Q Who is Laila?
23	devices used by Waymo or Google?	23	A Laila Mattos.
24	MR. JAFFE: Object to form.	24	Q And who what was her role?
25	THE WITNESS: I'm not aware of any public 14:44:5	2 25	A Project manager. I think it stayed on her 14:47:36
	Page 30		Page 32
1	disclosure. 14:44:53	1	desk, but 14:47:39
2	BY MR. CHATTERJEE:	2	Q And what what device was on her desk?
3	Q Are you aware of anybody keeping printed	3	A A PBR5.
4	circuit boards as momentos when they've either left	4	Q Is PBR5 in use today?
5	Waymo or Google or just even as they've continued as 14:45:0	6 5	A No. 14:47:50
6	employees?	6	Q Why not?
7	A I'm aware of a few instances there. None	7	A It was
8	of these were GBr circuit boards, just to make sure.	8	MR. JAFFE: Object to form
9	Q So tell me what those instances are.	9	THE WITNESS: Sorry.
10	A So the I know that Gaetan had kept, I 14:45:20	10	MR. JAFFE: and outside the scope. 14:47:53
11	guess, a PBR5, and I brought home, like, a PBR5 and	11	THE WITNESS: PBR5 is the much earlier
12	a TBR, which had been brought back to to Google a	12	version to the PBR we use today. It's a very
13	few months later.	13	different very different capabilities, very
14	Q When did you take that momento?	14	different technology, and I think we we stopped
15	A I think that was Anthony was still 14:45:46	15	using it probably, like, three years ago-ish. 14:48:08
16	around because he was the one who told us we could	16	Something like that.
17	do that. So it was probably I mean, I guess a	17	MR. CHATTERJEE: I'm going to mark this as
18	year and two years ago maybe.	18	1826.
19	Q And why did you bring the TBR board back?	19	(Exhibit 1826 was marked for
20	A So that was a that was	20	identification by the court reporter.) 14:48:32
	The you know, after	21	BY MR. CHATTERJEE:
22		22	
	Anthony left and things got a bit complicated not		Q I've marked the document as 1826. I'm
23	complicated sorry that things got there was	23	going to give you the physical specimens in a
24 25	a lot of there was a lot of information that	24	minute. I just want to have a record of what it is
Z D	Anthony, like, had fed me that I thought was that 14:46:27	25	I'm giving you. These are pictures of each side of 14:48:4
	Page 31		Page 33

1	the device that I'm giving you. 14:48:46	1	A No, I was not at her goodbye party. 14:50:38
2	A Okay.	, – 2	Q Are you aware of anyone giving her these
3	Q I'm going to hand you the device here, and	3	as a gift at a going away party?
4	you can open the bag and take it out.	4	A I was totally unaware of that, no.
5	A Yeah. 14:48:54	5	Q Okay. And and you were never present 14:50:51
		6	
6	Q Do you recognize these devices, Mr. Droz?		in any of those meetings?
7	A Let me look at the identification number	7	A The party I was not, no.
8	on it.	8	Q You're familiar she left the company?
9	Q I can give you a magnifying glass if it	9	A Yeah.
10	would be helpful. 14:49:12	10	Q Up until today were you aware that Ms. Oz 14:50:58
11	MR. JAFFE: Has this been made available	11	actually had earrings that were the two printed
12	in discovery?	12	circuit boards of the GBr
13	MR. CHATTERJEE: It is now.	13	A No, I just discovered it today. You just
14	MR. JAFFE: You're just making available	14	told me, basically.
15	that you had devices in discovery? 14:49:1	7 15	Q And 14:51:12
16	MR. CHATTERJEE: I just got them.	16	Do you know what the difference is between
17	MR. JAFFE: From where?	17	
18	MR. CHATTERJEE: Yesterday. You'll find	18	A The exact differences, no. I mean, it's
19	out soon enough.	19	like, a small improvement, better version, hence the
20	Q Go ahead, Mr. Droz. 14:49:23	20	different in the output. 14:51:31
21	A Okay. So sorry. What is your	21	Q But these ones would have the
22	question?	(22)	right?
23	Q Do you recognize these documents?	23	A It actually doesn't because it doesn't
24	A I mean, documents, no, but the boards,	24	have diodes on it. This is just bare PCB.
25	yes. 14:49:38	25	Q It would just have the PCB? 14:51:39
		20	Q It would just have the FCB.
	Page 34		Page 36
1	Q Okay. What are those boards? 14:49:38	1	A Yeah, this is just bare PCB. 14:51:40
2	A Those boards are early version of the GBr2	2	Q Now, when I look at those, can I tell that
3	transmit boards.	3	there are on the control on it?
4	Q Okay. If you would look you can use	4	A Actually, let me rephrase what I just
5	the magnifying glass if it would be helpful. It's 14:49:47	5	said. This one doesn't have diodes. The left one 14:51:4
6	and then	6	does have diodes.
7	Do you see that?	7	Q But you can actually see them on there,
8	A Yes, that would be two versions of it.	8	right?
9		9	A Yeah. Can I see?
10	Q Now, there's something attached to the side of those. Do you see those? Do you know what 14:50:04	10	Q This is the version, correct? 14:51:56
11	those are?	11	A Corrected. Yes. It does have lasers.
		12	
12	A They look like ear like I don't	13	Q And it also has the right?
13	know. I think they look like ear how do you	14	A Yes, I couldn't tell you if they're
14	call it? Like, earring rings.	15	· · · · · · · · · · · · · · · · · · ·
15	Q Are you familiar with anyone giving 14:50:16		what size they are, what 14:52:18
16	earrings giving the printed circuit boards as	16	Q Do you know if the size for those
17	earrings to someone as a gift?	17	changed from GBr2 to GBr3?
18	A No, I'm not.	18	A I am not sure. I don't know. That I
19	Q Okay. And so you're not familiar with	19	don't know. I know that the
20	Seval Oz? 14:50:26	20	changed a little bit. So it's possible that they 14:52:30
21	A I'm sorry. I'm familiar with her, but her	21	changed the
22	having that, I'm totally not familiar with it.	22	Q Would you be concerned at all that someone
23	Q So you were not at a at a party where	23	gave these to Ms. Oz as a gift when she was leaving
24	they gave these to her as a gift when she left the	24	her employment
25	company? 14:50:37	25	A Yeah. 14:52:42
	Page 35		Page 37
	1490 33		

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1	Q with Google? 14:52:42	1	MR. JAFFE: Same objection. 14:54:36
2	A Yes.	2	THE WITNESS: I'm not aware of that.
3	Q Why?	3	BY MR. CHATTERJEE:
4	A Because this is this is confidential	4	Q You're not aware of any instance where a
5	information. This is our designs. That's not 14:52:47	5	picture of a Google printed circuit board for LiDAR 14:54:
6	something we should give to someone, especially if	6	was published in a catalog?
7	someone is leaving the company.	7	A A picture of no.
8	Q Would it surprise you that these earrings	8	Q Do you know why Anthony Levandowski was
9	were given to her on the Google facilities as a gift	9	not sued for trade secret misappropriation?
10	before she left? 14:53:00	10	MR. JAFFE: Object to form. And 14:55:12
11	MR. JAFFE: Object to form.	11	objection. Beyond the scope.
12	THE WITNESS: So let me put it this way:	12	What topic are we on here?
13	It would surprise me. If Anthony had done this, it	13	MR. CHATTERJEE: "All measures taken by
14	would surprise me less, but that's more just from my	14	Google and/or Waymo to protect trade secrets Waymo
15	knowledge of what 14:53:16	15	claims was misappropriated by Otto Trucking." 14:55:21
16	BY MR. CHATTERJEE:	16	Whether you sued him or not and why falls within
17	Q If he hadn't given it to her but someone	17	that.
18	else had, would that surprise you?	18	MR. JAFFE: That is not a question for a
19	A It would, yes, probably.	19	fact witness. Is that is not within the scope
20	Q Where does Ms. Oz work now? 14:53:27	20	MR. CHATTERJEE: He's a 30(b)(6) witness. 14:55:30
21	A I'm not sure. I know she was even like	21	He can answer it. If he doesn't know, he can say he
22	when she left Google, she was getting pretty an	22	doesn't know.
23	executive role, maybe CEO of some I don't know	23	MR. JAFFE: Objection. Beyond the scope.
24	exactly I didn't know Seval that well.	24	And I'm going to object to form.
25	Q Do you know if she's working on 14:53:45	25	THE WITNESS: I don't know why. 14:55:38
	Page 38		Page 40
1	self-driving car technologies? 14:53:47	1	MD IAFFE OL 1 11 MILLS 14 55 40
2	self-driving car technologies? 14:53:47 A I don't I don't know if she is.	2	MR. JAFFE: Oh, and I don't think it's 14:55:40 problematic given your answer, but I also just want
3	Q Okay. I can take the earrings back.	3	to caution you not to reveal any attorney-client
4	A Sure.	4	communications.
5	MR. CHATTERJEE: We'll make them available 14:53:55	5	BY MR. CHATTERJEE: 14:55:48
6	for inspection whenever you want, Jordan. We'll	6	Q Do you know if Google does anything to
7	keep the pictures of the record just so it's clear	7	ensure compliance by vendors with respect to
8	what it was.	8	Google's confidential information associated with
9	THE WITNESS: Sorry.	9	its printed circuit boards?
10	MR. JAFFE: Thank you. 14:54:05	10	MR. JAFFE: Objection. Beyond the scope. 14:56:0
11	BY MR. CHATTERJEE:	11	THE WITNESS: So I know that we you
12	Q Are you aware	12	know, from a from talking with Tim Willis and
13	A I'm sorry.	13	seeing how the DSM team works, I know they do
14	Q No. You can hold on to that.	14	inspect the counter facilities. I think one of the
15	Are you aware of any vendors publishing 14:54:12	15	thing they check is how the information there is 14:56:1'
16	pictures of printed circuit boards made	16	segmented into between different projects. I
17	A I mean of our circuit boards?	17	know we have NDAs put in place with vendors and, you
		18	know, subcontractors as well.
18	Q Let me ask it more precisely. That's a	19	BY MR. CHATTERJEE:
19	fair point.	20	Q Do you know if they do any proactive 14:56:3
20	Are you aware of any vendors publishing 14:54:27	21	monitoring to make sure that vendors aren't using
21	pictures of the printed circuit boards or designs of	22	the information incorrectly?
22	Google?	23	MR. JAFFE: Objection. Beyond the scope.
23	MR. JAFFE: Object to form.	24	Form.
24	BY MR. CHATTERJEE:	25	THE WITNESS: I know we do site visits. 14:56:4
2.5			
25	Q For LiDAR devices? 14:54:36		

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2	BY MR. CHATTERJEE: 15:48:44	1	footprints for as a recommendation for for 15:50:29
-	Q All right. Do you design printed circuit	2	implementation. In this case, you know, we we
3	boards?	3	use the recommendation. It's something that they
4	A I do design PCBs, yes.	4	give to us.
5	Q And when you design PCBs, do you refer to 15:48:55	5	MR. CHATTERJEE: I think I'm done with the 15:50:4
6	parts libraries at all?	6	30(b)(6). So we can move to the individual
7	MR. JAFFE: Objection. Beyond the scope.	7	deposition unless you guys have questions.
8	THE WITNESS: Do you mean, like, do I use	8	MR. JAFFE: I I didn't want to ruin
9	the parts libraries that	9	your flow here, but I need to go back to the little
10	BY MR. CHATTERJEE: 15:49:04	10	earrings that you put in front of Mr. Droz. 15:50:55
11	Q Correct.	11	Because Mr. Levandowski's deposition is
12	A I do use the the Google or Waymo parts	12	happening right now, did he give you those earrings?
13	libraries.	13	MR. CHATTERJEE: I I obtained the
14	Q And where do those parts of the parts	14	earrings. I don't have to disclose how I got them.
15	libraries come from? 15:49:13	15	I did an investigation. 15:51:11
16	A We make them. Either I or some some	16	MR. JAFFE: Did he point you to the
17	other people on the team.	17	earrings?
18	Q And is that information discerned from	18	MR. CHATTERJEE: I'm not putting this on
19	third-party sources that supply the parts?	19	the record. We're not discussing this.
20	MR. JAFFE: Object to form. 15:49:23	20	MR. JAFFE: He's being deposed right now. 15:51:16
21	THE WITNESS: I mean, the libraries we	21	MR. CHATTERJEE: That's fine.
22	make them. Like, it's not they don't come from	22	MR. JAFFE: We
23	third parties.	23	MR. CHATTERJEE: You can do whatever you
24	BY MR. CHATTERJEE:	24	want.
25	Q So none of the parts that are in that 15:49:29	25	MR. JAFFE: I'm entitled to the 15:51:20
	Page 86		Page 88
1	parts library are based upon data sheets or 15:49:31	1	opportunity 15:51:22
2	references from a third party?		
		2.	MR_CHATTERIEE: We're going off the
3		2	MR. CHATTERJEE: We're going off the record. When I I don't have to disclose my work
	MR. JAFFE: Object to form.	2 3 4	record. When I I don't have to disclose my work
3	MR. JAFFE: Object to form. THE WITNESS: They are based on data	3 4	record. When I I don't have to disclose my work product or my investigations.
3 4	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37	3 4 5	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25
3 4 5	MR. JAFFE: Object to form. THE WITNESS: They are based on data	3 4	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We want to depose where they came from. Tell me
3 4 5 6	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it	3 4 5 6	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz.
3 4 5 6 7	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves.	3 4 5 6 7	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we
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1	MR. JAFFE: Okay. And 15:51:55	1	I, the undersigned, a Certified Shorthand
2	MR. CHATTERJEE: And now I am because I	2	Reporter of the State of California, do hereby
3	have them.	3	certify:
4	We're going off the record. Let's take a	4	That the foregoing proceedings were taken
5	break. 15:52:01	5	before me at the time and place herein set forth;
6	MR. JAFFE: That's fine. We can go off	6	that any witnesses in the foregoing proceedings,
7	the record.	7	prior to testifying, were administered an oath; that
8	THE VIDEOGRAPHER: Okay. We're going off	8	a record of the proceedings was made by me using
9	the record. The time is 3:52 p.m., and this	9	machine shorthand which was thereafter transcribe
10	concludes today's testimony given by Pierre-Yves 15:52:	7 10	under my direction; that the foregoing is a true
11	Droz. The total number of media used was one and	11	record of the testimony given.
12	will be retained by Veritext Legal Solutions.	12	Further, that if the foregoing pertains to the
13	(TIME NOTED: 3:52 p.m.)	13	original transcript of a deposition in a Federal
14	(TIME 110 TEB. 3.32 p.m.)	14	Case, before completion of the proceedings, review
15		15	of the transcript [] was [] was not requested.
16		16	I further certify that I am neither
		17	financially interested in the action nor a relative
17		18	or employee of any attorney or any party to this
18		19	action.
19		20	IN WITNESS WHEREOF, I have this date
20		21	subscribed my name.
21		22	Dated: 8/23/17
22		23	
23			<%signature%>
24		24	Catherine A. Ryan, RMR, CRR
25		25	CSR No. 8239
	Page 90		Page 92
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	I, PIERRE-YVES DROZ, do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct. EXECUTED this day of, 2017, at, (City) (State) PIERRE-YVES DROZ VOLUME I		
	Page 91		
	1 4 9 0 3 1		